

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both
individually and as Legal Guardian of
SHANE ALLEN LOVELAND, et al.,

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

Case No. 8:18-cv-00127

**DECLARATION OF CLARK W. HEDGER IN SUPPORT OF
THE GOODYEAR TIRE & RUBBER COMPANY'S
TRIAL BRIEF**

I, Clark W. Hedger, declare as follows:


1. My name is Clark W. Hedger. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts stated herein are true and correct.

2. True and accurate copies of the documents identified in The Goodyear Tire & Rubber Company's Trial Brief are attached to the Index in Support of The Goodyear Tire & Rubber Company's Trial Brief.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10th day of March, 2020, in St. ~~Louis~~, Missouri.

2020, in St. Louis, Missouri.


CLARK W. HEDGER